

# Exhibit F

**From:** [Dalton, Rebecca](#)  
**To:** [Gill, Robert C.](#); [Rubman, Gary](#); [Antonelli, Matthew](#)  
**Cc:** [Fu, Yale](#); [Sawyer, Michael](#); [Swanson, Peter](#); [Roman, Neil](#); [dluthey@gablelaw.com](mailto:dluthey@gablelaw.com); [jhodes@hodeslc.com](mailto:jhodes@hodeslc.com); [Duane Zobrist](#); [Jonathan Jacobs](#); [Schaufelberger, Thomas S.](#); [Flax, Sherry H.](#); [Platt, Henry A.](#); [VGTvCastleHill](#); [Darling, Jeremy B.](#)  
**Subject:** RE: VGT v. Castle Hill - VGT Discovery Responses  
**Date:** Wednesday, June 13, 2018 5:46:20 PM  
**Attachments:** [image008.png](#)

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Bob,

Following up on my email below, please confirm whether the reports that were included in CHG's document production on Friday are the "financial and game placement reports" referenced in Jason Sprinkle's deposition, and if so, please confirm that CHG has now completed its production of such reports.

In addition, please confirm whether CHG has now completed its production of all financial data.

Best,  
Rebecca

## Rebecca Dalton

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**From:** Dalton, Rebecca  
**Sent:** Monday, June 04, 2018 5:51 PM  
**To:** Gill, Robert C. <[Robert.Gill@saul.com](mailto:Robert.Gill@saul.com)>; Rubman, Gary <[grubman@cov.com](mailto:grubman@cov.com)>; Antonelli, Matthew <[matt.antonelli@saul.com](mailto:matt.antonelli@saul.com)>  
**Cc:** Fu, Yale <[yfu@cov.com](mailto:yfu@cov.com)>; Sawyer, Michael <[msawyer@cov.com](mailto:msawyer@cov.com)>; Swanson, Peter <[pswanson@cov.com](mailto:pswanson@cov.com)>; Roman, Neil <[nroman@cov.com](mailto:nroman@cov.com)>; [dluthey@gablelaw.com](mailto:dluthey@gablelaw.com); [jhodes@hodeslc.com](mailto:jhodes@hodeslc.com); [Duane Zobrist <dzobrist@zoblaw.com>](mailto:dzobrist@zoblaw.com); [Jonathan Jacobs <jjacobs@zoblaw.com>](mailto:jjacobs@zoblaw.com); [Schaufelberger, Thomas S. <tschauf@saul.com>](mailto:tschauf@saul.com); [Flax, Sherry H. <Sherry.Flux@saul.com>](mailto:Sherry.Flux@saul.com); [Platt, Henry A. <Henry.Platt@saul.com>](mailto:Henry.Platt@saul.com); [VGTvCastleHill <VGTvCastleHill@cov.com>](mailto:VGTvCastleHill@cov.com); [Darling, Jeremy B. <Jeremy.Darling@saul.com>](mailto:Jeremy.Darling@saul.com)  
**Subject:** RE: VGT v. Castle Hill - VGT Discovery Responses

Bob,

We have reviewed the documents that you produced on May 22, which you claim are responsive to our requests for financial information. The information CHG has produced is incomplete and poorly organized. We find it difficult to believe that these documents are the best that you have found to show CHG's financial data, particularly given that CHG has several investors who we assume require CHG to report accurate and understandable information about its financial performance and placement of games. Indeed, we note that CHG has produced at least one document (CHG0097121) containing detailed performance data for CHG games that is more organized and comprehensive (although that document also is incomplete, as it goes only through May 2017) than the financial data CHG has produced. The fact that CHG could generate this performance data suggests that CHG also can generate more complete financial information that is responsive to our requests.

Accordingly, please clarify whether CHG intends to produce any additional financial data, aside from the "financial and game placement reports" referenced in Jason Sprinkle's deposition, or whether CHG will have completed its production of financial data once it produces the "financial and game placement reports."

If CHG does intend to produce additional financial data aside from the "financial and game placement reports," we note that it has now been more than 8 months since VGT first requested these data. Since that time, VGT has made at least seven additional requests for such data, and the parties have met and conferred on the issue.

If CHG does not intend to produce additional financial data, please explain why CHG is able to provide more detailed performance data (CHG0097121), but is not able to provide the specific information we have requested. We also ask you to make an explicit representation that the documents in CHG's productions are the best that you have found to show CHG's financial data and that you will not attempt to introduce any additional documents relating to financial data at trial, whether they be admitted through a damages expert or otherwise. Likewise, we assume that any experts who testify on CHG's behalf will not be provided access to any data or information that has not been produced to VGT in a timely manner.

Finally, please also produce an updated version of the performance data that was included in CHG0097121.

Please provide the requested confirmation by the end of day on Wednesday.

Best,  
Rebecca

**Rebecca Dalton**

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**From:** Gill, Robert C. <[Robert.Gill@saul.com](mailto:Robert.Gill@saul.com)>

**Sent:** Thursday, May 24, 2018 5:47 PM

**To:** Rubman, Gary <[grubman@cov.com](mailto:grubman@cov.com)>; Antonelli, Matthew <[matt.antonelli@saul.com](mailto:matt.antonelli@saul.com)>

**Cc:** Fu, Yale <[yfu@cov.com](mailto:yfu@cov.com)>; Sawyer, Michael <[msawyer@cov.com](mailto:msawyer@cov.com)>; Dalton, Rebecca <[RDalton@cov.com](mailto:RDalton@cov.com)>; Swanson, Peter <[pswanson@cov.com](mailto:pswanson@cov.com)>; Roman, Neil <[nroman@cov.com](mailto:nroman@cov.com)>; [dluthey@gablelaw.com](mailto:dluthey@gablelaw.com); [jhodes@hodeslc.com](mailto:jhodes@hodeslc.com); Duane Zobrist <[dzobrist@zoblalaw.com](mailto:dzobrist@zoblalaw.com)>; Jonathan Jacobs <[jjacobs@zoblalaw.com](mailto:jjacobs@zoblalaw.com)>; Schaufelberger, Thomas S. <[tschauf@saul.com](mailto:tschauf@saul.com)>; Flax, Sherry H. <[Sherry.Flax@saul.com](mailto:Sherry.Flax@saul.com)>; Platt, Henry A. <[Henry.Platt@saul.com](mailto:Henry.Platt@saul.com)>; VGTvCastleHill <[VGTvCastleHill@cov.com](mailto:VGTvCastleHill@cov.com)>; Darling, Jeremy B. <[Jeremy.Darling@saul.com](mailto:Jeremy.Darling@saul.com)>

**Subject:** RE: VGT v. Castle Hill - VGT Discovery Responses

Gary,

The production on Tuesday denominated (5.22.18) consisted of financial documents. That was the production that Messrs. Antonelli and Fu corresponded about yesterday. The Bates range for that production is CHG95720 – CHG0120663.

Bob

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**From:** Rubman, Gary [<mailto:grubman@cov.com>]

**Sent:** Thursday, May 24, 2018 1:33 PM

**To:** Antonelli, Matthew

**Cc:** Fu, Yale; Sawyer, Michael; Dalton, Rebecca; Swanson, Peter; Roman, Neil; [dluthey@gablelaw.com](mailto:dluthey@gablelaw.com); Gill, Robert C.; [jhodes@hodeslc.com](mailto:jhodes@hodeslc.com); Duane Zobrist; Jonathan Jacobs; Schaufelberger, Thomas S.; Flax, Sherry H.; Platt, Henry A.; VGTvCastleHill; Darling, Jeremy B.

**Subject:** RE: VGT v. Castle Hill - VGT Discovery Responses

Bob,

It does not appear that Castle Hill has yet produced the financial information we requested months ago. Although we were told it would be in the document production from earlier this week, it does not appear to have been included in that production. To the extent you believe Castle Hill has produced the requested financial information, please identify the Bates numbers for such information.

- Gary

---

**From:** Antonelli, Matthew <[matt.antonelli@saul.com](mailto:matt.antonelli@saul.com)>

**Sent:** Monday, May 21, 2018 4:40 PM

**To:** Rubman, Gary <[grubman@cov.com](mailto:grubman@cov.com)>

**Cc:** Fu, Yale <[yfu@cov.com](mailto:yfu@cov.com)>; Sawyer, Michael <[msawyer@cov.com](mailto:msawyer@cov.com)>; Dalton, Rebecca <[RDalton@cov.com](mailto:RDalton@cov.com)>; Swanson, Peter <[pswanson@cov.com](mailto:pswanson@cov.com)>; Roman, Neil <[nroman@cov.com](mailto:nroman@cov.com)>; [dluthey@gablelaw.com](mailto:dluthey@gablelaw.com); Gill, Robert C. <[Robert.Gill@saul.com](mailto:Robert.Gill@saul.com)>; [jhodes@hodeslc.com](mailto:jhodes@hodeslc.com); Duane Zobrist <[dzobrist@zoblax.com](mailto:dzobrist@zoblax.com)>; Jonathan Jacobs <[jjacobs@zoblax.com](mailto:jjacobs@zoblax.com)>; Schaufelberger, Thomas S. <[tschauf@saul.com](mailto:tschauf@saul.com)>; Flax, Sherry H. <[Sherry.Flax@saul.com](mailto:Sherry.Flax@saul.com)>; Platt, Henry A. <[Henry.Platt@saul.com](mailto:Henry.Platt@saul.com)>; VGTvCastleHill <[VGTvCastleHill@cov.com](mailto:VGTvCastleHill@cov.com)>; Darling, Jeremy B. <[Jeremy.Darling@saul.com](mailto:Jeremy.Darling@saul.com)>

**Subject:** RE: VGT v. Castle Hill - VGT Discovery Responses

Good Afternoon Gary –

We will be making a production of Castle Hill financial information no later than Wednesday (5/23) of this week.

Best,  
Matt

**SAUL EWING  
ARNSTEIN  
& LEHR** LLP

**Matthew J. Antonelli**

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---

**From:** Rubman, Gary [<mailto:grubman@cov.com>]

**Sent:** Monday, May 21, 2018 4:22 PM

**To:** Darling, Jeremy B.

**Cc:** Fu, Yale; Sawyer, Michael; Dalton, Rebecca; Swanson, Peter; Roman, Neil; [dluthey@gablelaw.com](mailto:dluthey@gablelaw.com); Gill, Robert C.; [jhodes@hodeslc.com](mailto:jhodes@hodeslc.com); Duane Zobrist; Jonathan Jacobs; Schaufelberger, Thomas S.; Flax, Sherry H.; Platt, Henry A.; Antonelli, Matthew; VGTvCastleHill

**Subject:** RE: VGT v. Castle Hill - VGT Discovery Responses

Jeremy,

I am writing to follow-up once again on the status of Castle Hill's production of financial information in response to the discovery requests we served many months ago. We have raised this issue several times already and discussed it during meet and confer sessions. Moreover, almost two weeks ago, Bob Gill wrote that "[t]he CHG financial information is being reviewed and processed for production." When will that information be produced?

Thanks.

- Gary

**Gary Rubman**

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**From:** Rubman, Gary  
**Sent:** Wednesday, May 16, 2018 10:20 PM  
**To:** Darling, Jeremy B. <[Jeremy.Darling@saoul.com](mailto:Jeremy.Darling@saoul.com)>  
**Cc:** Fu, Yale <[yfu@cov.com](mailto:yfu@cov.com)>; Sawyer, Michael <[msawyer@cov.com](mailto:msawyer@cov.com)>; Dalton, Rebecca <[RDalton@cov.com](mailto:RDalton@cov.com)>; Swanson, Peter <[pswanson@cov.com](mailto:pswanson@cov.com)>; Roman, Neil <[nroman@cov.com](mailto:nroman@cov.com)>; [dluthey@gablelaw.com](mailto:dluthey@gablelaw.com); Gill, Robert C. <[Robert.Gill@saoul.com](mailto:Robert.Gill@saoul.com)>; [jhodes@hodeslc.com](mailto:jhodes@hodeslc.com); Duane Zobrist <[dzobrist@zoblax.com](mailto:dzobrist@zoblax.com)>; Jonathan Jacobs <[jjacobs@zoblax.com](mailto:jjacobs@zoblax.com)>; Schaufelberger, Thomas S. <[tschauf@saoul.com](mailto:tschauf@saoul.com)>; Flax, Sherry H. <[Sherry.Flax@saoul.com](mailto:Sherry.Flax@saoul.com)>; Platt, Henry A. <[Henry.Platt@saoul.com](mailto:Henry.Platt@saoul.com)>; Antonelli, Matthew <[matt.antonelli@saoul.com](mailto:matt.antonelli@saoul.com)>; VGTvCastleHill <[VGTvCastleHill@cov.com](mailto:VGTvCastleHill@cov.com)>  
**Subject:** Re: VGT v. Castle Hill - VGT Discovery Responses

Jeremy,

Can you please let us know when Castle Hill will be producing the financial information that we requested last year and that Bob has assured us on several occasions would be produced promptly? To the extent Castle Hill has produced the financial information we requested, please identify it by bates numbers. We will be following up separately on the other categories of documents that Castle Hill has not yet produced.

Thanks.

- Gary

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(202) 778-5465 (fax)

Sent from my iPad

On May 16, 2018, at 10:16 PM, Darling, Jeremy B. <[Jeremy.Darling@saoul.com](mailto:Jeremy.Darling@saoul.com)> wrote:

Yale:

We are following up on our below requests. Please advise as to when VGT will be producing the documents which it previously agreed to locate and produce. We note that James Starr was a recipient of all of the documents requested below or the underlying emails relating to those documents. As you know, Mr. Starr's deposition is scheduled for one week from today. Please produce these documents well in advance of Mr. Starr's deposition so as to not cause any further delay.

Regards,

Jeremy

<image001.jpg>

**Jeremy B. Darling**

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\* Please note that our Firm name and my email address have changed.

---

**From:** Darling, Jeremy B.

**Sent:** Thursday, May 10, 2018 8:25 PM

**To:** 'Fu, Yale'; Sawyer, Michael; Rubman, Gary; Dalton, Rebecca; Swanson, Peter; Roman, Neil; '[dluthey@gablelaw.com](mailto:dluthey@gablelaw.com)'

**Cc:** Gill, Robert C.; '[jhodes@hodeslc.com](mailto:jhodes@hodeslc.com)'; 'Duane Zobrist'; 'Jonathan Jacobs'; Schaufelberger, Thomas S.; Flax, Sherry H.; Platt, Henry A.; Antonelli, Matthew

**Subject:** RE: VGT v. Castle Hill - VGT Discovery Responses

Yale:

We disagree with VGT's narrow construction of Castle Hill's RFPs, and cannot comprehend VGT's position that VGT's product release plans are not relevant and responsive. Castle Hill's RFP 66, for example, specifically requests "[a]ny and all documents concerning the past, present, and future plans to advertise, market, sell, or promote each VGT Game." Further, VGT produced underlying emails in which these presentations were circulated by way of an internal Sharepoint link, and in which reference was made to "Release Management Monthly Meetings" at which these presentations were reviewed. We also disagree with VGT's efforts to construe Castle Hill's document production as incomplete or its position as inconsistent. Castle Hill has identified and requested the production of relevant documents which were not produced in VGT's initial production, and those documents should be produced now.

As mentioned previously, these documents were circulated internally to numerous VGT employees including Barry Smitherman. While we appreciate that VGT has agreed to locate and review these documents, we are disappointed by VGT's failure to timely produce these documents in advance of Mr. Smitherman's deposition despite multiple requests. In light of VGT's failure, Castle Hill reserves the right to leave Mr. Smitherman's deposition open.

Regards,

Jeremy

<image001.jpg>

**Jeremy B. Darling**

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\* Please note that our Firm name and my email address have changed.

---

**From:** Fu, Yale [<mailto:yfu@cov.com>]

**Sent:** Wednesday, May 09, 2018 3:14 PM

**To:** Darling, Jeremy B.; Sawyer, Michael; Rubman, Gary; Dalton, Rebecca; Swanson, Peter; Roman, Neil; '[dluthey@gablelaw.com](mailto:dluthey@gablelaw.com)'

**Cc:** Gill, Robert C.; '[jhodes@hodgeslc.com](mailto:jhodes@hodgeslc.com)'; 'Duane Zobrist'; 'Jonathan Jacobs'; Schaufelberger, Thomas S.; Flax, Sherry H.; Platt, Henry A.; Antonelli, Matthew

**Subject:** RE: VGT v. Castle Hill - VGT Discovery Responses

Jeremy,

Please see the responses below.

Best regards,

Yale

---

**From:** Darling, Jeremy B. <[Jeremy.Darling@saul.com](mailto:Jeremy.Darling@saul.com)>

**Sent:** Monday, May 07, 2018 8:26 PM

**To:** Fu, Yale <[yfu@cov.com](mailto:yfu@cov.com)>; Sawyer, Michael <[msawyer@cov.com](mailto:msawyer@cov.com)>; Rubman, Gary <[grubman@cov.com](mailto:grubman@cov.com)>; Dalton, Rebecca <[RDalton@cov.com](mailto:RDalton@cov.com)>; Swanson, Peter <[pswanson@cov.com](mailto:pswanson@cov.com)>; Roman, Neil <[nroman@cov.com](mailto:nroman@cov.com)>; '[dluthey@gablelaw.com](mailto:dluthey@gablelaw.com)' <[dluthey@gablelaw.com](mailto:dluthey@gablelaw.com)>

**Cc:** Gill, Robert C. <[Robert.Gill@saul.com](mailto:Robert.Gill@saul.com)>; '[jhodes@hodgeslc.com](mailto:jhodes@hodgeslc.com)' <[jhodes@hodgeslc.com](mailto:jhodes@hodgeslc.com)>; 'Duane Zobrist' <[dzobrist@zoblalaw.com](mailto:dzobrist@zoblalaw.com)>; 'Jonathan Jacobs' <[jjacobs@zoblalaw.com](mailto:jjacobs@zoblalaw.com)>; Schaufelberger, Thomas S. <[tschauf@saul.com](mailto:tschauf@saul.com)>; Flax, Sherry



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**Subject:** RE: VGT v. Castle Hill - VGT Discovery Responses

Yale:

Thank you for your email. Please see the below responses and produce the requested documents as soon as possible in light of this week's depositions.

1) We are puzzled by VGT's position that its internal Sharepoint production is complete merely because VGT "produced responsive documents from VGT's internal Sharepoint site based on running search terms." If VGT produced an email or other document discussing or relating to a document located on VGT's internal Sharepoint, the document located on VGT's internal Sharepoint is relevant and should also be produced. If VGT's production of the underlying emails discussing these presentations is not enough to concede the relevance of the presentations (we believe it is), the presentations appear to be product release plans and therefore fall within RFPs 61, 62, and 66, and likely 44-50, among others. We note that these documents were circulated among numerous VGT employees which include Barry Smitherman. Please produce these presentations tomorrow so we can review them in advance of Mr. Smitherman's deposition. Thank you for confirming the production of the attachments to the emails; please also provide the Bates ranges for the same.

We disagree with your assertion that these particular documents fall into the categories of what we have agreed to produce in response to the RFPs that you identify. We also disagree with your position that the production of emails automatically concedes that all documents referenced therein are responsive, and we disagree that a document is relevant simply because it is referenced in another document that happened to hit on a search term. Indeed, we note that Castle Hill has not followed this same rule in its productions. (See attached example of a Castle Hill email that cites to a document in Castle Hill's Dropbox that has not been produced by Castle Hill.)

That being said, in an effort to reach compromise, we are attempting to locate the documents cited in these emails and will produce them to the extent they are relevant and non-privileged.

As for the "Unnamed Attachment" files referenced in these emails, to clarify, these are "Microsoft Hyperlink Records" and are not picked up by the document processing engine because they are categorized as immaterial. Thus, there are no Bates numbers for these attachments.

2) Again, we disagree with VGT's position regarding its internal Sharepoint. Please produce the product management internal Sharepoint presentation or explain why the emails discussing these presentations are relevant but the actual presentations are not

relevant. Thank you for confirming that you will also be reviewing the "Multimedia Games Competitive Review" presentation discussed in the VGT email chain. Following your review, please produce the same.

Again, to clarify, this email does not refer to a "product management internal Sharepoint presentation." Rather, it points to a SharePoint folder that appears to contain documents called "game requirements sheets." Although we continue to disagree that this email alone suggests that these documents are relevant and responsive, we will attempt to locate these documents and determine whether they are in fact relevant and responsive.

3) Thank you for confirming you will be reviewing the "MGAM Competitive Review" discussed in this document. Following your review, please produce the same.

Regards,

Jeremy

<image001.jpg>

**Jeremy B. Darling**

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\* Please note that our Firm name and my email address have changed.

---

**From:** Fu, Yale [<mailto:yfu@cov.com>]

**Sent:** Sunday, May 06, 2018 11:49 PM

**To:** Darling, Jeremy B.; Sawyer, Michael; Rubman, Gary; Dalton, Rebecca; Swanson, Peter; Roman, Neil; [dluthey@gablelaw.com](mailto:dluthey@gablelaw.com)

**Cc:** Gill, Robert C.; [jhodes@hodeslc.com](mailto:jhodes@hodeslc.com); 'Duane Zobrist'; 'Jonathan Jacobs'; Schaufelberger, Thomas S.; Flax, Sherry H.; Platt, Henry A.; Antonelli, Matthew

**Subject:** RE: VGT v. Castle Hill - VGT Discovery Responses

Jeremy,

Please see the responses to your email below, in red.

Best regards,

Yale

**Yale Fu**

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Redwood Shores, CA 94065-1418  
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**From:** Darling, Jeremy B. <[Jeremy.Darling@saul.com](mailto:Jeremy.Darling@saul.com)>  
**Sent:** Thursday, May 03, 2018 8:59 PM  
**To:** Sawyer, Michael <[msawyer@cov.com](mailto:msawyer@cov.com)>; Rubman, Gary <[grubman@cov.com](mailto:grubman@cov.com)>; Dalton, Rebecca <[RDalton@cov.com](mailto:RDalton@cov.com)>; Swanson, Peter <[pswanson@cov.com](mailto:pswanson@cov.com)>; Roman, Neil <[nroman@cov.com](mailto:nroman@cov.com)>; 'dluthey@gablelaw.com' <[dluthey@gablelaw.com](mailto:dluthey@gablelaw.com)>; Fu, Yale <[yfu@cov.com](mailto:yfu@cov.com)>  
**Cc:** Gill, Robert C. <[Robert.Gill@saul.com](mailto:Robert.Gill@saul.com)>; 'jhodges@hodgeslc.com' <[jhodges@hodgeslc.com](mailto:jhodges@hodgeslc.com)>; 'Duane Zobrist' <[dzobrist@zoblaw.com](mailto:dzobrist@zoblaw.com)>; 'Jonathan Jacobs' <[jjacobs@zoblaw.com](mailto:jjacobs@zoblaw.com)>; Schaufelberger, Thomas S. <[tschauf@saul.com](mailto:tschauf@saul.com)>; Flax, Sherry H. <[Sherry.Flax@saul.com](mailto:Sherry.Flax@saul.com)>; Platt, Henry A. <[Henry.Platt@saul.com](mailto:Henry.Platt@saul.com)>; Antonelli, Matthew <[matt.antonelli@saul.com](mailto:matt.antonelli@saul.com)>  
**Subject:** VGT v. Castle Hill - VGT Discovery Responses

Counsel:

In advance of next week's depositions, please produce the following documents which appear to have been omitted from your previous document productions:

1) The PowerPoint presentations referenced in VGT0012132, VGT0012134, and VGT0012136, along with any attachments to those emails;

We can confirm that we have produced all attachments to these emails. We have also produced responsive documents from VGT's internal Sharepoint site based on running search terms. Please explain which RFPs you believe the .pptx files referenced in VGT0012132, VGT0012134, and VGT0012136 are responsive to and why these files are responsive.

2) All documents, presentations, and reports referenced in VGT0019062 which have not already been produced, including but not limited to the following: (a) 2016 MGL "Master Games List" presentation, (b) "product management share point,"; and (c) the "competitor report" with the file name beginning with "Multimedia Games Competitive Review"; and

The 2016 MGL "Master Games List" presentation has been produced with starting

bates numbers VGT0019023 and VGT0019064. Regarding the "product management share point," we have already produced responsive documents from VGT's internal Sharepoint site. We are investigating the "Multimedia Games Competitive Review."

3) The MGAM Competitive Review referred to in VGT0019345.

We are investigating the link to the "MGAM Competitive Review" in this document and will circle back.

Regards,

Jeremy

<image001.jpg>

**Jeremy B. Darling**

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\* Please note that our Firm name and my email address have changed.

"Saul Ewing Arnstein & Lehr LLP ([saul.com](http://saul.com))" has made the following annotations:

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